

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn^o
David M. Estes

Writer's Direct Dial & Email:
(973) 228-0473
bbaldinger@mazieslater.com

Karen G. Kelsen^o
Cheryll A. Calderon
Adam M. Epstein^o
Cory J. Rothbort*^o
Michael R. Griffith^o
Christopher J. Geddis
Samuel G. Wildman
Julia S. Slater^o

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

^oMember of N.J. & NY Bars

December 23, 2021

VIA ECF ONLY

Honorable Juan R. Sanchez, U.S.C.J.
United States District Court, Eastern District of Pennsylvania
James A. Byrne United States Courthouse
Room 14613
Philadelphia, Pennsylvania 19106-1797

**Re: Xavier Ingram v. County of Camden, et al.
Civil Action No.: 1:14-cv-05519**

Dear Judge Sanchez:

This joint letter is submitted to advise the Court as to the status of two pending Motions In Limine. With regard to Defendants' Daubert Motion seeking to bar certain opinions of Dr. Chapman, (D.E. 142, 177, 188, 206) counsel will endeavor to resolve outstanding issue and will report back to the Court as to those remaining opinions that a ruling is requested. We expect to be able to report back to the Court with results by the second or third week in January.

With regard to Plaintiff's Motion In Limine seeking, inter alia, to bar the defendants' late production of Administrative Review Reports and new Use of Force (DMS) training records (D.E. 294, in part) defendants have agreed to produce additional information and a Rule 30(b)(6) witness on these matters. Accordingly, at this time plaintiff requests that this specific relief as contained in this Motion in Limine be held in abeyance pending satisfactory completion of this outstanding discovery.

On behalf of all counsel, we wish Your Honor and staff a happy and healthy holiday season.

Respectfully,

MAZIE SLATER KATZ & FREEMAN, LLC

By: /s/Beth G. Baldinger
BETH G. BALDINGER

Honorable Juan R. Sanchez, U.S.C.J.

December 23, 2021

Page 2

BROWN & CONNERY, LLP

By: /s/William F. Cook
WILLIAM F. COOK

cc: All Counsel of Record (Via ECF Only)

BGB:tl/Encl.

I:\BGB\Ingram\Sanchez - Joint ltr Re Motions in Limine 12-23-21.docx